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Attorney Docket No.: 1033-LB1031

REMARKS

This amendment is filed in response to the Non-final Office Action (the "Office Action") mailed on October 17, 2006, in which claims 1-13 and 31-37 were rejected. Applicant respectfully requests reconsideration.

Claims 1, 32 and 35-37 Are Allowable over Crockett

Applicant traverses the rejection of claims 1, 32 and 35-37 under 35 U.S.C. §102(e) over U.S. Patent Publication No. 2004/0141596 ("Crockett") at page 2, paragraph 5 of the Office Action. Crockett does not disclose or suggest a system including a data connector "to convert the data from an enterprise data format to a common data format," as recited in claims 1, 35, and 37.

Crockett discloses conversion from hypertext markup language (HTML) to extensible markup language (XML) (i.e. from a first common data format to a second common data format). *See Crockett*, p. 9, paragraph 00124. However, Crockett fails to disclose or suggest "a data connector to "convert the data from an enterprise format to a common data format for constructing a voice directory, as recited in claims 1, 35 and 37. Therefore, Crockett fails to disclose or suggest each and every element of claims 1, 35, and 37, and of claims 32 and 36, at least by virtue of their dependency from one of claims 1 and 35, respectively.

Claims 1-13, 32, and 34 Are Allowable over Keung in view of Crockett

Applicant traverses the rejection of claims 1-13, 32 and 34 under 35 U.S.C. §103(a) over U.S. Patent No. 6,956,848 ("Keung") in view of Crockett at page 6, paragraph 7 of the Office Action. The asserted combination of Keung and Crockett fails to disclose each and every element of claim 1.

Specifically, the asserted combination of Keung and Crockett does not disclose or suggest a system including a data connector to receive data from a remote enterprise information system via a public network and to convert the data from an enterprise data format to a common data format suitable for constructing a voice directory, as recited in claim 1. Keung discloses

switching incoming calls from a telephone line to a computer address of a remote telecommunications system via the Internet. *See Keung*, Abstract. Keung discloses that the system may instruct a caller to respond with oral commands, for example, saying "directory" to access and hear a company directory. *See Keung*, col. 14, line 64 to col. 15, line 1. The Office Action acknowledges that Keung fails to disclose or suggest "a data connector to receive data from a remote enterprise information system via a public network." Further, Keung fails to disclose or suggest a data connector "to convert the data from an enterprise data format to a common data format suitable for constructing a voice directory," as recited in claim 1.

As previously discussed, Crockett fails to disclose or suggest a data connector "to convert the data from an enterprise data format to a common data format suitable for constructing a voice directory," as recited in claim 1. Accordingly, the asserted combination of Keung and Crockett fails to disclose or suggest each and every element of claim 1, and of claims 2-13, 32 and 34, at least by virtue of their dependency from claim 1.

Further, the Examiner has failed to establish a *prima facie* case of obviousness. Particularly, there is no motivation to combine the switching system of Keung with the auto-attendant system of Crockett. The Office Action asserts that such a combination would have been obvious to enable the subscriber to create, modify, and delete customized call handling scripts through a web client. *See Office Action*, p. 7, paragraph 7. However, Keung discloses an auto-attendant that is programmable to the extent that an administrator can adjust the structure of the menus, the time of day, the location of the caller, setting time-out limits, and setting call-back numbers. *See Keung*, col. 5, lines 52-59. Keung provides no indication that the auto-attendant is programmable using scripts. Moreover, Keung makes no suggestion that such a feature is desirable.

By contrast, Crockett discloses a system that provides switching functionality and includes a voice language markup platform that is already capable of switching calls. *See Crockett*, Abstract. The Office Action cites to paragraph 172 of Crockett as providing motivation to make the asserted combination; however, paragraph 172 provides no motivation for including the teachings of Keung into the system of Crockett, since Crockett already includes such switching functionality. Accordingly, there is no motivation to make the asserted

combination, except that provided by the present application. Therefore, the rejection of claims 1-13, 32 and 34 over the combination of Keung and Crockett constitutes an impermissible hindsight reconstruction and should be withdrawn.

For at least the foregoing reasons, the cited references, alone or in combination, fail to disclose or suggest each and every element of claims 1-13, 32 and 34. Accordingly, Applicant respectfully requests reconsideration and withdrawal of all pending rejections.

Claims 31 and 33 Are Allowable Over Keung, Crockett and Roberts

Applicant traverses the rejection of claims 31 and 33 under 35 U.S.C. §103(a) over Keung and Crockett and further in view of U.S. Patent No. 6,999,930 ("Roberts") at page 11, paragraph 8 of the Office Action. The asserted combination fails to disclose or suggest each and every element of these claims. As previously discussed, the asserted combination of Keung and Crockett fails to disclose or suggest a system including a data connector to receive data from a remote enterprise information system via a public network and to convert the data from an enterprise data format to a common data format suitable for constructing a voice directory, as recited by claim 1, from which claims 31 and 33 depend. Roberts fails to overcome the deficiencies of Keung and Crockett.

Roberts discloses a voice dialog server that structures queries to back-end databases in an appropriate format (e.g., structured query language (SQL) format). *See Roberts*, col. 11, lines 40-45. Roberts discloses that text variables from the voice recognizer may be processed to more accurately retrieve information from the back-end systems. *See Roberts*, col. 11, lines 12-17. However, Roberts does not disclose or suggest "a data connector to receive data from a remote enterprise information system via a public network and to convert the data from an enterprise data format to a common data format suitable for constructing a voice directory," as recited in claim 1. Roberts fails to disclose or suggest that the results of the SQL query are received via a public network or that such results require any conversion. Thus, the asserted combination of Keung, Crockett and Roberts fails to disclose or suggest a system including a data connector to receive data from a remote enterprise information system via a public network and to convert the data from an enterprise data format to a common data format suitable for constructing a voice

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directory, as recited by claim 1. Thus, the asserted combination fails to disclose each and every element of claims 31 and 33, at least by virtue of their dependency from claim 1.

Further, the Examiner has failed to establish a *prima facie* case of obviousness. Particularly, there is no motivation to make the asserted combination. Keung and Crockett fail to suggest any motivation for combining the connector of Roberts with the combination of Keung and Crockett. Crockett already suggests communication with subscriber databases and web servers. *See Crockett*, Figure 1. Roberts provides no motivation to make the asserted combination. The Office Action states that it would have been obvious "to modify Keung and Crockett to use [sic] second data connector compatible to other dispersed enterprise systems as taught by Roberts in order to be able to retrieve integrated data on a per user basis using SQL query, which can be customized per user as is well known in the art." *See Office Action*, p. 12, paragraph 8. However, the suggested motivation is not made obvious by the references, since Crockett already allows communication with subscriber databases and web servers. The addition of an SQL query is not needed. Accordingly, there is no motivation to combine Keung, Crockett and Roberts, except the motivation provided by the present application. Therefore, the asserted combination is an impermissible hindsight reconstruction, and should be withdrawn.

At least for the foregoing reasons, claims 31 and 33 are allowable over the combination of Keung, Crockett and Roberts, and the rejections of claims 31 and 33 should be withdrawn.

CONCLUSION

For at least the foregoing reasons, the pending claims are allowable over the cited references, alone or in combination. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the rejections, as well as an indication of the allowability of each of the pending claims.


Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date


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